

## STORCH AMINI PC

Steven G. Storch  
MEMBER NY & IL BARS

212.497.8216  
sstorch@storchamini.com

February 15, 2018

**VIA ECF**

Hon. Katherine B. Forrest  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl St., Courtroom 23B  
New York, NY 10007

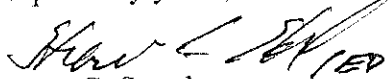
**Re: Peterson v. Islamic Republic of Iran, No. 10-cv-4518-KBF (S.D.N.Y.)**

Dear Judge Forrest:

We represent “damages attorney” Jay Glenn who has pending before Your Honor a motion to intervene in the above-referenced action for the limited purpose of objecting to the Special Master’s report and for permission to join the QSF Trustee in his D.C. action (*Glenn v. Fay*, No. 1:16-cv-01452-RCL (D.D.C.)) to enforce his equitable lien.

In connection with Mr. Glenn’s motion (Dkt. No. 883), we previously noted that lead counsel, Thomas Fay and Stephen Perles, had successfully moved to quash the lien Mr. Glenn had asserted under District of Columbia law, and that such decision was on appeal. We now write for permission to supplement the record with the enclosed decision issued this morning by the United States Court of Appeals for the District of Columbia Circuit, of which the Court may also take judicial notice. Although the D.C. Circuit affirmed the quashing of Mr. Glenn’s lien to the extent that it reached the funds due from the QSF Trust to the *Peterson* plaintiffs, the Court strongly suggested that Mr. Glenn may have an equitable lien against the QSF Trust funds that will be distributed to Messrs. Fay & Perles as attorneys’ fees—the very reason that Mr. Glenn has sought permission from this Court to join the Trustee in his D.C. action. The D.C. District Court had, in the decision affirmed, expressly held that a D.C. lien could reach the funds recovered in the New York turnover proceeding, *Peterson v. Islamic Republic of Iran*, 220 F. Supp. 3d 98, 105 (D.D.C. 2016), and we note that such lien, if it arose by operation of D.C. law, would have attached to the funds before they were turned over to the QSF Trustee.

Respectfully yours,

  
Steven G. Storch

Enclosure  
cc: All counsel via ECF